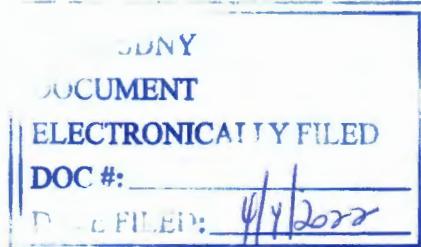


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April 1, 2022

**VIA ECF**

Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2550  
New York, New York 10007

Re: Jane Doe v. Polise Consulting Engineers, D.P.C. et al.  
United States District Court, Southern District of New York  
Civil Action No. 21-cv-00609 (CM) (SDA)

**MEMO ENDORSED**

*OK* *Colleen McMahon*

*4/4/2022*

Dear Chief Judge McMahon:

We represent defendant Polise Consulting Engineers, D.P.C. ("PCE") in the above-captioned action and are writing, in accordance with Section I(D) of Your Honor's Individual Practices, to respectfully request that the Court (i) extend the parties' deadline to submit their joint pre-trial order and other trial filings from April 15 to May 6, 2022, and (ii) "so-order" the following proposed briefing schedule for PCE's anticipated motion for summary judgment:

- 1) PCE to file its moving papers by May 5, 2022;
- 2) Plaintiff to file her opposition papers by June 9, 2022; and
- 3) PCE to file its reply papers by June 30, 2022.

The reason for this request is to accommodate the professional schedule of the undersigned in the coming weeks which includes, among various depositions and applications, the filing of a respondent's brief with the Appellate Division, First Department on April 20<sup>th</sup> and the filing of moving papers on a motion for summary judgment before Judge Cronan of this Court on May 6<sup>th</sup>.

Plaintiff and co-defendant consent to this request. This is PCE's first request to extend the pre-trial submissions deadline. There were two prior requests made by plaintiff and one prior request made by co-defendant to extend the fact discovery and pre-trial submissions deadlines, all of which were granted by the Court on consent.

Respectfully submitted,

/s/ *Jared E. Blumetti*

Jared E. Blumetti

cc: Counsel of record (*via ECF*)